

1  
2  
3  
4  
5  
6  
7  
8  
9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,  
13 Individual and Representative Plaintiffs,  
14 v.  
15 META PLATFORMS, INC., a Delaware  
16 corporation;  
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI VO IN SUPPORT  
OF ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL JOINT DISCOVERY LETTER  
BRIEF**

1 I, Nikki Vo, hereby declare:

2 1. I am Director and Associate General Counsel for Defendant, Meta Platforms, Inc. I  
3 have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,  
4 could and would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal  
6 portions of the Parties' Joint Discovery Letter regarding Meta's Responses to Plaintiffs' First and  
7 Second Sets of Requests for Production ("Joint Letter Brief"). The motion seeks to have the  
8 following partially sealed:

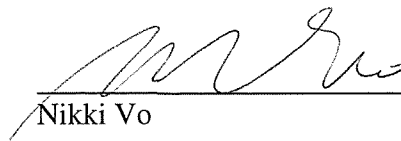
Document	Sealing Request
Joint Letter Brief	<ul style="list-style-type: none"> <li>Redacted portions</li> </ul>

11 3. Although Meta disagrees with Plaintiffs' characterizations of Meta's actions, the  
12 redacted portions of the Joint Letter Brief nevertheless refer to highly sensitive, confidential  
13 information concerning Meta's non-public business strategies in developing its Llama models.  
14 This information was taken from deposition testimony of Meta's witnesses and documents  
15 produced by Meta that were marked "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL –  
16 ATTORNEYS' EYES ONLY" under the Protective Order in this case.

17 4. Public disclosure of the redacted information in the Joint Letter Brief exposes Meta  
18 to the risk of competitive harm. Meta takes steps to carefully protect the confidentiality of  
19 information of this sort.

20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct

22 Executed in Palo Alto, California on this 26<sup>th</sup> day of November, 2024.

23  
24  
25   
Nikki Vo

26 311335374